

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

JOHN BOUCHER,

CASE NO.: 18-cv-760-jdp

Plaintiff,

v.

W. BRADLEY MARTIN and
DEBRA TIDQUIST,

Defendants.

**PLAINTIFF'S IDENTIFICATION OF POTENTIAL
TRIAL HYBRID EXPERT WITNESS**

NOW COMES, Plaintiff, JOHN BOUCHER, by and through his undersigned attorney pursuant the Court's September 10, 2020 Preliminary Pretrial Conference Order and Fed. R. Civ. P. 26(a)(2) and identifies the following individual as a potential Hybrid Expert Witness. This potential witness has not been retained or specially employed to provide expert testimony in this action. The potential witness is not an employee of the Plaintiff whose duty is to provide expert opinion or testimony:

1. **WITNESS**

Dr. Michael McKee
755 E. McDowell Road
Phoenix, Arizona 85006
(602) 521-3250

TESTIMONY SUMMARY

Subject Matter:

On November 12, 2020, the witness, in his capacity as Plaintiff's Orthopedic Surgeon, performed a total reverse shoulder replacement surgery on Plaintiff's right shoulder.

Summary of Facts and Opinions:

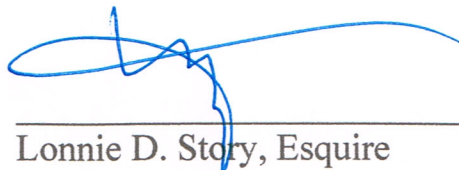
Witness will testify as to his personal knowledge, based upon review of Plaintiff's medical records, medical assessment of Plaintiff's right shoulder injury(ies) by examination and diagnostic testing and opinions formed thereafter in support of his diagnosis, and recommendation for Plaintiff's total reverse shoulder replacement surgery. The witness will testify as to the factual implications of prior treatment/non-treatment leading to the surgery. Particularly, the witness will testify as to whether the course of treatment/non-treatment by Defendant Martin had bearing on his expert opinion and diagnosis of Plaintiff's right shoulder condition prior to recommending and performing the total reverse shoulder replacement surgery of Plaintiff's right shoulder.

2. Plaintiff is continuing investigation and discovery and reserves the right to supplement this listing as his investigation and discovery proceeds.

3. Plaintiff reserves the right to call any expert witness identified by the defendant(s).

Dated: December 18, 2020

RESPECTFULLY SUBMITTED,



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